



Comcast Corporation
300 New Jersey Avenue, NW
Suite 700
Washington, DC 20001

March 13, 2015

VIA ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: *Applications of Comcast Corp., Time Warner Cable Inc., Charter Communications, Inc., and SpinCo for Consent to Assign or Transfer Control of Licenses and Authorizations, MB Docket No. 14-57*

Dear Ms. Dortch:

On March 11, 2015, David L. Cohen, Executive Vice President of Comcast Corporation (“Comcast”), and the undersigned met with Jonathan Sallet, General Counsel; Hillary Burchuk of the Office of General Counsel; and Phil Verveer, Senior Counselor to Chairman Wheeler, to discuss the status of the above-captioned proceeding. We reviewed the pleading cycle dates; the Commission’s requests for information along with Applicants’ substantial narrative responses and voluminous documents (totaling millions of pages) produced in response thereto; subsequent submissions by the Applicants and other parties; the Commission’s Economic Analysis Workshop; and the impact of the pending litigation in the D.C. Circuit regarding third parties’ access to Video Programming Confidential Information.¹

We also discussed why claims raised in the proceeding that Comcast will gain greater leverage in programming and interconnection negotiations as a result of the transaction and will use it to harm online video distributors are unfounded. We noted that Comcast addressed these claims in detail in a recent *ex parte* presentation, in which Comcast also reiterated several of the substantial public interest benefits of the transaction.²

¹ See *Commission Restarts Clock in Comcast-Time Warner Cable and AT&T-DirecTV Merger Proceedings and Establishes Dates for Respective Pleading Cycles*, Public Notice, 29 FCC Rcd. 14491 (2014); Letter from William Lake, Chief, Media Bureau, to Marlene H. Dortch, Secretary, FCC, MB Docket No. 14-57 (Feb. 4, 2015) (ex parte notice for economist workshop); *CBS Corp. v. FCC*, Case No. 14-1242 (D.C. Cir.); see also Letter from Kathryn A. Zachem, Senior Vice President, Comcast Corporation, to Marlene H. Dortch, Secretary, FCC (Sept. 11, 2014) (submitting responses to Commission’s Information and Data Request); Letter from Kathryn A. Zachem, Senior Vice President, Comcast Corporation, to Marlene H. Dortch, Secretary, FCC (Feb. 5, 2015) (submitting responses to Commission’s Second Information and Data Request).

² See Letter from Kathryn A. Zachem, Senior Vice President, Comcast Corporation, to Marlene H. Dortch, Secretary, FCC (Mar. 12, 2015).

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Please direct any questions to the undersigned.

Respectfully submitted,

/s/ Kathryn A. Zachem

Senior Vice President,
Regulatory and State Legislative Affairs
Comcast Corporation

cc: Hillary Burchuk
Jonathan Sallet
Phil Verveer